

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LAUNCE TURNER,

Plaintiff,

v.

EMW, Inc.,

Defendant.

Case No. 2:20-cv-01756-BJR

**STIPULATION AND ORDER TO
CONTINUE DISPOSITIVE MOTION
DEADLINES; PRETRIAL
DEADLINES; AND TRIAL DATE**

Plaintiff Launce Turner and Defendant EMW, Inc., through their counsel of record, respectfully request the Court to extend the deadline for filing dispositive motions in order to allow the Parties to complete mediation and conduct a 30(b)(6) deposition before preparing those motions.

Under Fed. R. Civ. P. 16(b)(4) and LCR 16(b)(4), the Court may modify the case schedule for good cause. Here, good cause exists because a private mediation is scheduled for October 21, 2021 before Cliff Freed of Washington Arbitration & Mediation Services (WAMS). This was Mr. Freed's first available date. Moreover, in order to reduce unnecessary expenditure of resources, the Parties agreed to November 1, 2021 (ten days after mediation) as the last day for 30(b)(6)

**STIPULATION AND [PROPOSED] ORDER TO CONTINUE
DISPOSITIVE MOTION DEADLINES**

2:20-CV-01756-BJR

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depositions to be conducted. The current deadline for filing dispositive motions of September 10, 2021 would require the Parties, as a practical matter, to prepare dispositive motions prior to mediation and completion of the 30(b)(6) deposition. The Parties wish to avoid time and expense that will be wasted if they are able to settle in mediation. Such expenditures will be detrimental to settlement efforts because they will increase the Parties' investment in this case and will distract counsel from preparation for mediation. As such, in order to promote efficiency, the Parties request that the Court continue the dispositive motion deadlines as follows:

	<u>Current Date</u>	<u>Proposed Date</u>
Deadline for Dispositive Motions:	September 10, 2021	November 15, 2021
Deadline to File Oppositions:	October 1, 2021	December 6, 2021
Deadline to File Replies:	October 15, 2021	December 20, 2021

The Parties do not request modification of the trial date or any other deadlines unless the Court believes that such additional extensions are necessary and proper in order to effectuate the Parties' current request for extension of the dispositive motion deadlines.

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CERTIFICATION OF CONFERRAL

The Parties hereby certify that they met and conferred on August 9, 2021 and agreed to the extension of the dispositive motion deadlines as set forth above.

Respectfully submitted this 18th day of August 2021.

/s/ Jonathan D. Perrone

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Attorneys for Defendant
EMW, Inc.


ORDER

THIS MATTER having come before the Court on the Parties' Stipulation to Continue Dispositive Motion Deadlines, now, therefore, IT IS HEREBY ORDERED that the deadlines are extended as follows:

	<u>Current Date</u>	<u>Proposed Date</u>
Deadline for Dispositive Motions:	September 10, 2021	November 15, 2021
Deadline to File Oppositions:	October 1, 2021	December 6, 2021
Deadline to File Replies:	October 15, 2021	December 20, 2021

In addition, the following deadlines are also continued as follows: Motions in Limine are due February 28, 2022; Joint Pretrial Statement due March 7, 2022; Pretrial Conference set for March 21, 2022 at 10:30 AM; Jury trial set for April 4, 2022.

DATED this 24th day of August, 2021.



Barbara Jacobs Rothstein
U.S. District Court Judge